

FINDING OF NO SIGNIFICANT IMPACT
FIRE AND FUELS MANAGEMENT PLAN
DEVILS POSTPILE NATIONAL MONUMENT
CALIFORNIA

PURPOSE AND NEED

The National Park Service proposes to implement a fire and fuels management program for the Devils Postpile National Monument (hereinafter called the monument). Wildland fires have been suppressed on monument lands by federal agencies even pre- dating its establishment in 1911. This plan will establish the relationships among fire management objectives, firefighter and public safety, and natural and cultural resource management objectives.

ALTERNATIVES

Selected Action

The selected action is the Preferred Alternative as described in the environmental assessment. The selected action presents the National Park Service proposed action and defines the rationale for the action in terms of resource protection and management, visitor and operational use, and costs.

Suppression with Fuels Treatments

Under this alternative, the monument would suppress all unplanned ignitions and use fuels treatments (mechanical and prescribed fire) to achieve resource objectives and reduce fuel loading. Unplanned ignitions would be suppressed using appropriate management techniques. Prescribed fire would be used to reduce accumulations of hazard fuel, and restore fire dependent habitats and ecological processes. Mechanical treatments would be applied in developed areas of the monument.

A prescribed fire would only be ignited if a burn plan was approved and signed, all the conditions of the burn plan were met, and on- site conditions were within prescriptive parameters. A prescription includes measurable criteria including fuel moisture, relative humidity, wind speed and current and forecasted fire weather. Burn plans also specify holding and contingency forces, ignition sequence, desired fire behavior characteristics, air quality, public health considerations, and measures to be taken to reduce the impacts of the operation. Pre- burn and post- burn monitoring would be used to determine if treatment objectives were being met. No prescribed fires will be conducted in wilderness.

Mechanical techniques would be used to reduce hazardous accumulations of fuels around structures and developed areas to decrease the likelihood of fire damage to monument infrastructure. A prescription for vegetation removal would be in effect for each mechanical treatment. This prescription will conform to the standards (including size and number of trees) in use at Sequoia & Kings Canyon National Parks (Appendix E of the Sequoia and Kings Canyon's *Fire and Fuels Management Plan*). Mechanical treatments would require follow up fuels reduction treatment, most often prescribed fire but could also include chipping of unwanted woody material. No mechanical treatments will be conducted in wilderness.

Staff from Sequoia & Kings Canyon National Parks, the Sierra Network, or the local interagency fire community will attempt to implement fuels treatments on approximately 55 acres in the monument over the next five years. During that period of time, fire management staff may identify additional units for treatment. A list of existing or proposed treatment units can be found in Appendix A of the companion *Fire and Fuels Management Plan*.

Fire monitoring plots established after the 1992 Rainbow Fire would continue to be monitored according to the protocols used by Sequoia and Kings Canyon National Parks. New plots would be established in treatment units prior to implementation of work. Monitoring results would be used to fine-tune prescriptions, as necessary, to ensure resource management objectives were achieved.

Other Alternatives Considered

The other alternative considered in the environmental assessment was the no-action alternative. The no-action alternative would be the continuation of existing fire management practices. All wildland fires would be suppressed using appropriate management techniques. Fire suppression personnel would, in a cost-effective manner, seek to limit the spread of all fires as quickly as possible, ensure public and firefighter safety, protect the monument's natural and cultural resources, and protect other private and public property. This alternative was rejected because the results will not meet the three project goals:

- Restore fire dependent habitats and ecological processes, while addressing fire fighter safety, protection of park resources and developments, and surrounding land uses and improvements.
- Reduce fire hazards in monument ecosystems.
- Reduce risk of unwanted wildland fire.

Environmentally Preferred Alternative

The environmentally preferred alternative is determined by applying the criteria suggested in the National Environmental Policy Act of 1969 (NEPA), which is guided by the Council on Environmental Quality (CEQ). The CEQ provides direction that "the environmentally preferable alternative is the alternative that will promote the national environmental policy as expressed in NEPA Section 101. The environmentally preferred alternative would:

- “1. fulfill the responsibilities of each generation as trustee of the environment for succeeding generations;
2. assure for all generations safe, healthful, productive, and aesthetically and culturally pleasing surroundings;
3. attain the widest range of beneficial uses of the environment without degradation, risk of health or safety, or other undesirable and unintended consequences;
4. preserve important historic, cultural and natural aspects of our national heritage and maintain, wherever possible, an environment that supports diversity and variety of individual choice;
5. achieve a balance between population and resource use that will permit high standards of living and a wide sharing of life’s amenities; and
6. enhance the quality of renewable resources and approach the maximum attainable recycling of depletable resources.”

This selected action is the environmentally preferred alternative because it more closely conforms to policies 1- 6. The current vegetation composition and distribution and abundance of fuel in the monument are unnatural. Fuels treatments can be used to help restore monument ecosystems and re- establish a more natural fire regime and vegetation. This would protect natural resources for future generations and help protect the surrounding areas from catastrophic fires. Implementation of fuels treatments would also better protect human infrastructure from unwanted fire.

The no- action alternative calls for the suppression of all wildland fires and therefore fails to conform to the policies outlined above. Full suppression measures leads to unhealthy ecosystems and catastrophic fires, like the Rainbow Fire which burned in the monument and surrounding National Forest in 1992.

MITIGATION

Mitigation measures have been incorporated into the selected action (preferred alternative) to reduce impacts as part of the proposed action. All mitigation measures are summarized in the matrix below.

Impact/Mitigation Matrix

Impact Topic	Mitigation Measures	Responsible Party
Soils	<p>Prescriptions designed to reduce fire severity during prescribed fire operations would be followed. Existing roads and trails would be used to the greatest extent possible as control lines for both wildland and prescribed fires.</p> <p>Tactics involving the use of handtools, which minimize the impacts to soil, would be employed to construct firelines, where appropriate. Fire management personnel would rehabilitate firelines after completing the operation to reduce soil loss through erosion.</p>	Monument

Impact Topic	Mitigation Measures	Responsible Party
Air Quality	<p>Several methods are available to reduce the impacts to air quality including, (1) minimizing the area burned, (2) reducing the fuel loading in the area to be burned through mechanical pretreatment, (3) reducing the amount of fuel consumed by fire through the use of smaller burn units, and (4) minimizing emissions per ton of fuel consumed by burning under favorable conditions or using different firing techniques.</p> <p>Prescribed burns would not be conducted under conditions where ambient levels of ozone are already determined to be unhealthy. Prescriptive elements in prescribed burn plans would specify the proper conditions necessary to increase smoke dispersal and enhance burning, thereby reducing impacts from smoke.</p> <p>Under the Clean Air Act, the Park Service is responsible for protecting air quality within monument boundaries. The Park Service must also take appropriate action to do so, when reviewing emission sources both within and in proximity to the monument (Malkin 1994, Clean Air Act, as amended). Therefore, all prescribed burns would be conducted in accordance with regulations established by the State of California and the Clean Air Act and the Smoke Management Plan.</p>	Monument
Water Quality	<p>In addition to the measures identified in the soils section, whenever possible, vegetation adjacent to streams and other water courses would be protected. The vegetation should sufficiently slow the flow of any run-off to permit debris and soil to be deposited before it could reach a stream or river. Site specific mitigation measures would be included in prescribed burn plans when appropriate. Activities would be coordinated with neighboring landowners and agencies to avoid impacting a specific watershed.</p> <p>Chemical fire retardant would be used sparingly and with maximum regard for aquatic life. Retardant use is highly discouraged near significant streams including the Middle Fork of the San Joaquin River. The potential area of spread for the fire would be analyzed by Resource Management staff and recommendations made for which streams may be impacted if tactically required to cross any stream with retardants. The Resource Advisor assigned to the fire will be consulted about the use of fire retardant within the monument. This consultation would occur on a daily basis to stay abreast of fire spread and potential impacts. Despite the intent to keep retardant and/or foam at a distance from significant streams, these chemicals may be released into those streams during fire suppression, especially on large fires.</p>	Monument

Impact Topic	Mitigation Measures	Responsible Party
Vegetation	Prescribed burning has direct and indirect effects on the environment. Proper use of prescribed fire and evaluation of the benefits and costs of a burn require knowledge of the manner in which fire affects vegetation. Prescribed burns would be implemented with appropriate consideration given to the historical role of fire and the potential impacts of its reintroduction to a given biotic (or plant) community. The intensity and frequency of fire in a given plant community would be controlled to meet resource objectives. Prescribed burns would be timed to achieve maximum benefits to a target species or biotic community and minimize adverse environmental effects.	Monument
Wildlife	Care would be taken to avoid burning during sensitive periods, for example, prior to fledging of ground nesting birds. Additional protection would be afforded to sensitive species (see Special Status Species).	Monument
Special Status Species	Known locations of sensitive species would be considered during wildland fire suppression operations unless it is known that fire enhances a particular species. All known listed species in a burn unit would be evaluated prior to a prescribed burn and protected as specified in the prescribed burn plan. All such measures would be identified in prescribed burn plans and in a site-specific, pre-attack wildland fire suppression plan.	Monument
Invasive Non-native Plants	There is a risk that prescribed fire would cause the establishment and spread of invasive plants. The risk can be minimized by managing the location and timing of fires and the presence of seed sources. Prescribed fires would be planned to avoid known locations of cheat grass populations. Because bull thistle is more widespread in the monument, absolute avoidance may not be possible. However, planned fire locations would be compared with known bull thistle locations so that pre- and post-fire invasive plant control could be administered to affected burn units. The risk that the close proximity of stock to a prescribed burn unit would provide a source of non-native plant seed would be minimized by the use of California certified weed-free feed by the Reds Meadow Pack Station. Region 5 of the U.S. Forest Service, which includes Inyo National Forest, is in the process of drawing up regulations to require use of California certified weed-free feed by all users and pack stations (Nelson, 2003).	Monument
Wilderness	Minimum Impact Suppression Techniques (MIST) would be used for all fire suppression activities in the monument (Appendix D of the companion <i>Fire and Fuels Management Plan</i>). A balance would be maintained between suppression objectives and resource protection. For example, instead of making a frontal attack on a fire, which would require a 5-foot wide fire line and bucket drops by helicopter, managers could choose to flank the	Monument

Impact Topic	Mitigation Measures	Responsible Party
	<p>fire and push it into a river or other natural barrier. The fire might burn more acreage, but the overall impact would be lower in comparison to the impact created by a direct attack.</p> <p>No prescribed fires or mechanical treatments will be conducted in wilderness.</p>	
Scenery and Recreation	When, during wildland fire suppression operations and prescribed fire operations, administrative closure of an area is necessary to provide for visitor protection, all affected trailheads would be signed so that closures would be easily recognized. Safety measures to ensure visitor safety include posting traffic warning signs and public notices and would be identified in the prescribed burn plan. Interpretative programs would be presented, when appropriate, to better inform the public of the role of fire in the ecosystem and explain the ways in which fire can be used to accomplish management objectives. The monument would work with adjacent landowners and the Forest Service to coordinate activities so that the visiting public would be impacted as little as possible.	Monument
Gateway Communities	Interpretative programs would be presented, when appropriate, to better inform the public of the role of fire in the ecosystem and the ways in which fire can be used to accomplish management objectives. The monument would work with the Forest Service to coordinate activities so that the gateway communities would be impacted as little as possible.	Monument

WHY THE SELECTED ACTION (PREFERRED ALTERNATIVE) WOULD NOT HAVE A SIGNIFICANT IMPACT ON THE HUMAN ENVIRONMENT

As defined by 40 CFR 1508.27, significance is determined by examining the following criteria:

Impacts That May Be Both Beneficial and Adverse

No major adverse or beneficial impacts were identified that would require analysis in an environmental impact statement. The selected action (preferred alternative) will have no or negligible impacts on scenery and recreation, gateway communities, natural soundscapes, cultural resources, geology, cultural landscapes, historic structures and districts, ethnographic resources, sacred sites, Indian trust resources, museum objects, socioeconomic resources, prime and unique farmland, land use, environmental justice, wild and scenic rivers and night skies.

Short- term, localized, minor, adverse impacts will occur to air quality and wilderness. Long-term, minor to moderate, beneficial impacts will occur to soils and wilderness. Long- term, minor to moderate, adverse impacts will occur to air quality, water quality, and invasive non-native species. Long- term, moderate to major, beneficial impacts will occur to vegetation, wildlife, and special status species.

Degree of Effect on Public Health or Safety

Human health standards (National Ambient Air Quality Standards for particulate matter size class of 10 microns in diameter and smaller and particulate matter of 2.5 microns in diameter and smaller) could be approached for short periods in the area immediately adjacent to the fire. These effects would generally last less than a week, depending on the size of the fire, the fuels, and the environmental conditions present.

There were no negative effects on public safety identified during preparation of the environmental assessment or agency consultation.

Unique Characteristics of the Geographic Area such as Proximity to Historic or Cultural Resources, Park Lands, Prime Farmlands, Wetlands, Wild and Scenic Rivers, or Ecologically Critical Areas

As described in the environmental assessment, ecologically critical areas, threatened and endangered species, wetlands, floodplains, wild and scenic rivers, and prime and unique farmlands will not be affected.

There are no known archeological, ethnographic, listed or eligible historic districts, or Indian trust resources proximate to the project area; therefore, no impacts to these resources are anticipated.

Degree to Which Effects on the Quality of the Human Environment are Likely to be Highly Controversial

There were no highly controversial effects identified during preparation of the environmental assessment or agency consultation.

Degree to Which the Possible Effects on the Quality of the Human Environment are Highly Uncertain or Involve Unique or Unknown Risks

There were no highly uncertain, unique, or unknown risks identified during preparation of the environmental assessment or agency consultation.

Degree to Which the Action May Establish a Precedent for Future Actions with Significant Effects or Represents a Decision in Principle About a Future Consideration

The selected action (preferred alternative) neither establishes a National Park Service precedent for future actions with significant effects or represents a decision in principle about a future consideration.

Whether the Action is Related to Other Actions with Individually Insignificant but Cumulatively Significant Impacts

Impacts to soils, air quality, water quality, vegetation, fire regime, wildlife, special status species, invasive non- native plants, wilderness resources, scenery and recreation, and gateway communities were analyzed in the environmental consequences section of the environmental assessment.

As described in the environmental assessment, cumulative impacts were determined by combining the impacts of the selected action (preferred alternative) with other past, present, and reasonably foreseeable future actions. Past, present, and future actions that may have potential to cumulatively impact resources include:

- **Soils** – The Inyo National Forest is increasing its use of prescribed fire. Its efforts, combined with the selected alternative could have a cumulative net benefit to soils in the monument area.
- **Air Quality** – The Inyo National Forest is currently increasing its use of fire to achieve resource objectives. Smoke from these fires in addition to smoke from prescribed fires in the monument could have a cumulative impact on visitors and local communities.
- **Air Quality** – Regional air quality during prescribed fire operations can be affected by weather; existing air quality; the size, timing, and duration of the activity; and other activities occurring in the same airshed when many acres are burned on the same day. The selected alternative would provide flexibility to schedule burns and to coordinate with other regional smoke producers to take advantage of favorable conditions that are required to disperse smoke and avoid regional cumulative smoke impacts.
- **Vegetation** – The prescribed burning program that is currently being implemented in the Inyo National Forest would interact with the implementation of the selected alternative to create a positive cumulative benefit to vegetation in the region. Landscape level habitat diversity would be maintained or increased.
- **Wildlife** – The prescribed burning program, which is being implemented in the Inyo National Forest, would interact with the selected alternative to create a positive cumulative benefit to wildlife in the region.
- **Invasive Non- native Plants** – Invasive plants present on adjoining Inyo National Forest lands could add cumulatively to the threat of non- native plant invasion after management fires. Stock passing through the monument from the Reds Meadow Pack Station may provide a source of new propagules after fire.

The short- term, negligible to minor, adverse impacts of the selected action (preferred alternative), combined with impacts of past, present, and reasonably foreseeable actions, could result in short- term, negligible to minor, adverse, cumulative impacts to air quality.

The long- term, negligible to moderate, adverse effects of the selected action (preferred alternative), combined with impacts of past, present, and reasonably foreseeable actions, could

result in long- term, negligible to moderate, adverse, cumulative effects to invasive non- native plants.

The long- term, minor to moderate, beneficial effects of the selected action (preferred alternative), combined with impacts of past, present, and reasonably foreseeable actions, could result in long- term, minor to moderate, beneficial, cumulative effects to soils, vegetation, and wildlife.

Degree to Which the Action May Adversely Affect an Endangered or Threatened Species or Its Critical Habitat

The selected action (preferred alternative) will not affect endangered or threatened species or critical habitat potentially occurring in or near the project area. Consultation with the U.S. Fish and Wildlife Service was completed and is consistent with this finding (see below).

Whether the Action Threatens a Violation of Federal, State, or Local Environmental Protection Law

The selected action (preferred alternative) violates no federal, state, or local environmental protection laws.

IMPAIRMENT OF PARK RESOURCES OR VALUES

The implementation of the selected action will not constitute an impairment of park resources or values. Impacts documented in the environmental assessment and summarized above will not affect resources or values key to the natural and cultural integrity of the park or alter opportunities for the enjoyment of the park. The selected action will not impair park resources and will not violate the National Park Service Organic Act. This conclusion is based on a thorough analysis of the impacts described in the environmental assessment, the lack of agency and public comments received, and the professional judgment of the decision- maker, in accordance with National Park Service Management Policies, 2001. As described in the environmental assessment, implementation of the selected action (preferred alternative) will not result in major adverse impacts to a resource or value whose conservation is (1) necessary to fulfill specific purposes identified in the establishing legislation or proclamation of Devils Postpile National Monument; (2) key to the natural or cultural integrity of the park; or (3) identified as a goal in the park's General Management Plan or other relevant National Park Service planning documents.

PUBLIC INVOLVEMENT AND AGENCY CONSULTATION

Internal consultation with fire management and resources specialists began in March of 2004. A press release went out on April 6th, 2004 notifying the public that a fire and fuels management plan and accompanying environmental assessment for Devils Postpile National Monument were being drafted. The press release was faxed to 45 cooperators, organizations, and media outlets, and emailed to an additional 400 employees, businesses, agencies, media

outlets, and local residents. A public meeting was held in the neighboring community of Mammoth Lakes on May 27th to begin public scoping and no members of the public attended.

Compliance with section 106 of the National Historic Preservation Act was completed through consultation with the California State Historic Preservation Office. The NPS determined that the project will have no adverse effect on identified historic resources. The State Historic Preservation Office concurred with this finding in a letter dated March 28, 2005.

Compliance with section 7(c) of the Endangered Species Act of 1973, as amended, was completed through informal consultation with the U.S. Fish and Wildlife Service. The NPS determined that the project will have no effect on any federally listed endangered or threatened species. The U.S. Fish and Wildlife Service was sent a copy of the environmental assessment on January 27, 2005 (and did not comment). Follow-up telephone calls on March 18 and 21, 2005 and April 18, 2005 confirmed that the agency would have no comment.

The environmental assessment was made available for public and agency review and comment during a 36-day period ending February 25, 2005. On January 21, 2005, a press release announcing the availability of the environmental assessment was faxed to 45 cooperators, organizations, and media outlets, and emailed to an additional 400 employees, businesses, agencies, media outlets, and local residents. Copies of the environmental assessment were placed in two libraries in the Mammoth Lakes area. An electronic copy of the environmental assessment was also placed on the monument's website. Paper copies were also available by mail, but none were requested.

No public comments were received.

The environmental assessment is not reprinted. This Finding of No Significant Impact, attached to the environmental assessment, presents the National Park Service selected action.

CONCLUSION

The selected action (preferred alternative) does not constitute an action that normally requires preparation of an environmental impact statement. The selected action (preferred alternative) will not have a significant effect on the human environment. Negative environmental impacts that could occur are considered negligible to moderate in intensity. Mitigation measures will be incorporated into the selected action (preferred alternative) to reduce or eliminate impacts.

There are no foreseen significant adverse impacts on public health, public safety, threatened or endangered species, historic properties, either listed in or eligible for listing in the NRHP, or other unique characteristics of the park. No highly uncertain or controversial impacts, unique or unknown risks, significant cumulative effects, or elements of precedence were identified. Implementation of the action will not violate any federal, state, or local environmental protection law, nor will it cause impairment of park resources or values.

Based on the foregoing, it has been determined that an environmental impact statement is not required for this project and, thus, will not be prepared.

Recommended:

/s/	4/21/05
Richard H. Martin, Superintendent	Date
Sequoia and Kings Canyon National Parks	

Approved:

/s/	4/29/05
Jonathan B. Jarvis, Regional Director	Date
National Park Service, Pacific West Region	